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Attorneys for Debtor and Debtor in Possession
Robin Elaine Mowbray

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
ROBIN ELAINE MOWBRAY,
Debtor and Debtor in Possession.

Case No. 8:25-bk-10543-SC

Chapter 11

**STIPULATION TO EXTEND DEADLINE
FOR PNC BANK TO FILE A COMPLAINT
TO DETERMINE DISCHARGEABILITY
OF DEBT**

[No hearing required]

1 This stipulation (the “Stipulation”) is entered into as of May 27, 2025, by and between Robin
2 Elaine Mowbray (the “Debtor”) and PNC Bank, N.A. (“PNC”) with reference to the following facts
3 and recitals:

4 A. The Debtor filed a voluntary petition under chapter 11 of the Bankruptcy Code on
5 February 19, 2025, commencing the above-captioned bankruptcy case (the “Case”).

6 B. The Case is currently pending before the above-entitled United States Bankruptcy
7 Court (the “Court”).

8 C. The deadline for PNC to file a complaint to determine whether certain debts are
9 dischargeable (a “523 Complaint”) is currently May 27, 2025 (the “Deadline”).

10 D. PNC has requested that the Debtor stipulate to an extension of the Deadline.

11 E. The Debtor has agreed to extend the Deadline as set forth below.

12 F. The Debtor and PNC desire to enter into this Stipulation in the interest of economy
13 and efficiency.

14 NOW, THEREFOR, based on the foregoing facts and recitals and the mutual promises and
15 consideration set forth herein, the receipt and adequacy of which is hereby acknowledged, the Debtor
16 and PNC hereby stipulate as follows:

- 17 1. The Deadline for PNC to file a 523 Complaint is continued to November 27, 2025;
18 and
19 2. The Debtor and PNC may further extend the Deadline by agreement in writing without
20 further order of this Court.

21 Respectfully submitted,

22 Roye Zur
23 Lauren Gans
24 ELKINS KALT WEINTRAUB REUBEN
25 GARTSIDE LLP

26 Dated: May 27, 2025

27 By:

28 Roye Zur

Attorneys for Debtor and Debtor-in-Possession
Mowbray Waterman Property, LLC

Michael B. Lubic
Connor J. Meggs
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Dated: May 27, 2025

By: /s/ Michael B. Lubic
Michael B. Lubic
Attorneys for PNC Bank, N.A.